

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

*In re Dealer Management Systems Antitrust  
Litigation*, MDL 2817

No. 1:18-CV-864

*This document relates to:*

Hon. Robert M. Dow, Jr.

*Cox Automotive, Inc, et al. v. CDK Global,  
LLC*, Case No. 1:18-CV-1058 (N.D. Ill.)

Magistrate Judge Jeffrey T. Gilbert

*Loop, LLC, d/b/a AutoLoop v. CDK Global,  
LLC*, Case No. 18-cv-2521 (N.D. Ill.)

**DEFENDANT CDK GLOBAL, LLCs' MOTION TO COMPEL PRODUCTION OF  
DOCUMENTS WITHHELD OR REDACTED BY PLAINTIFFS LOOP, LLC d/b/a  
AUTOLOOP AND COX AUTOMOTIVE, INC. OR, IN THE ALTERNATIVE, FOR AN  
IN CAMERA INSPECTION OF THE CHALLENGED DOCUMENTS**

Defendant CDK Global, LLC ("CDK"), respectfully moves this Court for an Order pursuant to Fed. R. Civ. P. 37 and Local Rule 37.2 directing the production of documents withheld or redacted by Plaintiffs Loop, LLC, d/b/a AutoLoop and Cox Automotive, Inc., or, in the alternative, for an *in camera* inspection of the challenged documents. In support of this motion, CDK submits the accompanying memorandum of law and exhibits.

Pursuant to Local Rule 37.2, CDK certifies that it has met its obligation to meet-and-confer in good faith regarding the issues raised in this motion, as follows:

1. The parties exchanged letters addressing the privilege logs, including, as relevant to this motion, on January 9, 2019, January 18, 2019, and February 8, 2019. *See* Exhibits 2, 3, and 10.

2. On January 23, 2019 and February 21, 2019, CDK met and conferred telephonically with Plaintiffs regarding the privilege logs.

Dated: March 1, 2019

Respectfully submitted,

/s/ Britt M. Miller

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CDK Global, LLC*

**CERTIFICATE OF SERVICE**

I, Britt M. Miller, an attorney, hereby certify that on March 1, 2019, I caused a true and correct copy of the foregoing **DEFENDANT CDK GLOBAL, LLC'S MOTION TO COMPEL PRODUCTION OF DOCUMENTS WITHHELD OR REDACTED BY PLAINTIFFS LOOP, LLC d/b/a AUTOLOOP AND COX AUTOMOTIVE, INC. OR, IN THE ALTERNATIVE, FOR AN IN CAMERA INSPECTION OF THE CHALLENGED DOCUMENTS** to be filed and served electronically via the court's CM/ECF system. Notice of this filing will be sent by e-mail to all parties by operation of the court's electronic filing system or by mail to anyone unable to accept electronic filing as indicated on the Notice of Electronic Filing. Parties may access this filing through the court's CM/ECF System.

/s/ Britt M. Miller

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